

**Amendments to the Drawings:**

The attached sheet of drawings includes new drawing FIG. 14.

**REMARKS**

This is in response to the Final Rejection of the pending claims in the Office Action mailed February 28, 2007.

Claims 1, 3, and 4 are currently pending in the application.

Claim 4 has been withdrawn from consideration.

Claims 1 and 3 stand rejected.

Applicants propose to amend claims 1 and 3, and respectfully request reconsideration of the application as proposed to be amended herein.

**Drawing Objections**

Applicants assert that new drawing Fig. 14 clearly comply with the provisions of 37 CFR § 1.83(a) to clearly illustrate the elements and claim limitations of presently amended independent claims 1 and 3.

**35 U.S.C. § 112 Claim Rejections**

Claims 1 and 3 stand rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that presently amended independent claims 1 and 3 clearly comply with the provisions of 35 U.S.C. § 112, first paragraph, to contain subject matter described in the specification regarding the embodiment of the invention illustrated in drawing Fig. 13 and newly added drawing Fig. 14 and specification paragraphs numbered [0045], [0045.1], [0072], [0073], [0074], and [0074.1] in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Applicants assert that the specification and drawings clearly comply with the provisions of 35 U.S.C. § 132 as no new matter has been added to the disclosure of the invention.

Claims 1 and 3 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that presently amended independent claims 1 and 3 clearly comply with the provisions of 35 U.S.C. § 112, second paragraph, to particularly point out and distinctly claim the subject matter which applicants regard as the invention described in the specification regarding the embodiment of the invention illustrated in drawing Fig. 13 and newly added drawing Fig. 14 and specification paragraphs numbered [0045], [0045.1], [0072], [0073], [0074], and [0074.1]. Applicants assert that the specification and drawings clearly comply with the provisions of 35 U.S.C. § 132 as no new matter has been added to the disclosure of the invention.

### **35 U.S.C. § 102(b) Anticipation Rejections**

#### **Anticipation Rejection Based on U.S. Patent 5,566,051 to Burns**

Claims 1 and 3 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Burns (U.S. Patent 5,566,051). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicants have amended the claimed invention to clearly distinguish over the cited prior art.

Applicants assert that the Burns reference does not and cannot anticipate the claimed inventions of presently amended independent claims 1 and 3 under 35 U.S.C. § 102 because the Burns reference does not identically describe, either expressly or inherently, each and every element of the claimed inventions in as complete detail as is contained in the claims.

Applicants assert that the Burns reference does not identically describe the elements of the claimed inventions of presently amended independent claims 1 and 3 calling for “adhesively attaching the cage to the substrate, the cage connecting at least one lead extending from a peripheral side of at least one integrated circuit package of the plurality of outer leads of the vertically stacked plurality of primary integrated circuit packages to at least one circuit of the substrate” and “attaching the cage to the substrate by adhesive attachment of the edge of each of two of the three peripheral sides of the cage to the substrate, the cage connecting at least one lead extending from a peripheral side of at least one integrated circuit package of the plurality of outer leads of the stacked plurality of primary integrated circuit packages to at least one circuit of the substrate”. In contrast to the elements of the claimed inventions of presently amended independent claims 1 and 3 the Burns reference describes with reference to drawing Figs. 12a, 12b13, 14, 15, and 16 the attaching of a package M to a circuit board 800 using a pin and hole arrangement. Such is not the claimed inventions of presently amended independent claims 1 and 3. Therefore, presently amended independent claims 1 and 3 are allowable.

### 35 U.S.C. § 103(a) Obviousness Rejections

#### Obviousness Rejection Based on U.S. Patent 5,566,051 to Burns in view of U.S. Patent 5,343,075 to Nishino

Claims 1 and 3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Burns (U.S. Patent 5,566,051) in view of Nishino (U.S. Patent 5,343,075). Applicants respectfully traverse this rejection, as hereinafter set forth.

M.P.E.P. 706.02(j) sets forth the standard for a Section 103(a) rejection:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant’s disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (Emphasis added).

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicants have amended the claimed invention to clearly distinguish over the cited prior art.

Applicants assert that any combination of the Burns reference in view of Nishino reference does not establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1 and 3 because any combination of the Burns reference in view of Nishino reference does not teach or suggest all the claim limitations of the claimed inventions.

Applicants assert any combination of the Burns reference in view of Nishino reference does not teach or suggest the claim limitations of the claimed inventions of presently amended independent claims 1 and 3 calling for “for “adhesively attaching the cage to the substrate, the cage connecting at least one lead extending from a peripheral side of at least one integrated circuit package of the plurality of outer leads of the vertically stacked plurality of primary integrated circuit packages to at least one circuit of the substrate” and “attaching the cage to the substrate by adhesive attachment of the edge of each of two of the three peripheral sides of the cage to the substrate, the cage connecting at least one lead extending from a peripheral side of at least one integrated circuit package of the plurality of outer leads of the stacked plurality of primary integrated circuit packages to at least one circuit of the substrate”. In contrast to the elements of the claimed inventions of presently amended independent claims 1 and 3 the Burns reference teaches or suggests with reference to drawing Figs. 12a, 12b13, 14, 15, and 16 the attaching of a package M to a circuit board 800 using a pin and hole arrangement while the Nishino reference teaches or suggests the soldering or thermo-compression bonding of the terminals 8 to the wiring lines 10. Such is not the claimed inventions of presently amended independent claims 1 and 3. Therefore, presently amended independent claims 1 and 3 are allowable.


### ENTRY OF AMENDMENTS

The proposed amendments to claims 1 and 3 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application to comply with the provisions of 35 U.S.C. § 132. Further, Applicants assert that the amendments do not raise new issues or require a further search and request the amendment to be entered in the application under 35 U.S.C. § 1.116. Applicants assert that the amendments place the application in condition for allowance, entry is respectfully requested upon filing of a Notice of Appeal herein.

### CONCLUSION

Claims 1 and 3 are believed to be in condition for allowance, and an early notice thereof is respectfully solicited. Should the Examiner determine that additional issues remain which might be resolved by a telephone conference, he is respectfully invited to contact Applicants' undersigned attorney.

Respectfully submitted,



James R. Duzan  
Registration No. 28,393  
Attorney for Applicants  
TRASKBRITT  
P.O. Box 2550  
Salt Lake City, Utah 84110-2550  
Telephone: 801-532-1922

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JRD/sfc:lmh

Attachment: New Drawing Sheet

Document in ProLaw